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pro hac vice applications to be filed

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NEW HORIZON HOME CARE, LLC, and
GUIDING LIGHT HOSPICE, INC.

Case No: 3:19-cv-00521-RCJ-WGC

Plaintiffs,

-VS-

NORTHEASTERN NEVADA REGIONAL HOSPITAL, HORIZON HOSPICE, INC., GENESIS HOSPICE, LLC, GENESIS HOME HEALTH SERVICES, INC., HIGHLAND MANOR, DREW BANFORD, BILLIE JEAN CRAWFORD, TRAVIS SPENCER, QUERUBIN IGUBAN, JR., M.D., DEBRA ANDERSON, MARISSELLA (CHELLA) ELLIOT, ALICE ALLEN,

**STIPULATION AND REQUEST
FOR EXTENSION OF TIME
[FIRST REQUEST]**

Defendants.

Defendant NORTHEASTERN NEVADA REGIONAL HOSPITAL (“Defendant”), by and through its counsel PHILLIP F. CRAMER and RYAN T. HOLT of the law firm of SHERRARD ROE VOIGT & HARBISON, PLC, pursuant to FRCP 6(b)(1)(A) and LR IA 6-1, respectfully request this Court for an extension of time until December 13, 2019 to provide a responsive pleading to Plaintiffs’ Complaint in the above-entitled matter for each of the following reasons:

1. Defendant has been acting diligently since obtaining a copy of the Complaint
2 to obtain a determination with its insurer about coverage and the appointment of defense
3 counsel, but despite that diligence no final decision has yet been received;

4. This extension request is only for approximately thirty (30) days, and this is the
5 first request by this Defendant for any extension of time; and

6. Counsel for Plaintiffs is not opposed to extend the time as described above.

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DATED: November 14, 2019.

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HARBISON, PLC
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9
DATED: November 14, 2019.

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13
By: /s/ Phillip F. Cramer
14 **PHILLIP F. CRAMER**
15 Tennessee Bar No. 20697
16 **RYAN T. HOLT**
Tennessee Bar No. 30191

17 *pro hac vice applications to be filed*

18
By: /s/ Stephen S. Kent
19 **STEPHEN S. KENT**
20 Nevada Bar No. 1251
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IT IS SO ORDERED:

22
Walter G. Cobb

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UNITED STATES MAGISTRATE JUDGE

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DATED: November 15, 2019.